

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Case No. 3:24-cv-00526-ART-CSD

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO COMPLETE VIDEO LOG
COMPLIANCE (ECF NO. 186) AND NOTICE OF SUBMISSION OF UPDATED VIDEO
LOG**

COMES NOW Plaintiff Drew J. Ribar, pro se, and respectfully requests that the Court grant an extension of time to complete compliance with the Amended Temporary Restraining Order (ECF No. 186), specifically the requirement to file a video log identifying any content posted between September 1, 2025 and November 13, 2025, referencing defense counsel Ms. Kertis or Ms. Liddell.

This Motion is supported by the good cause outlined below, pursuant to Fed. R. Civ. P. 6(b)(1)(A).

I. PROCEDURAL BACKGROUND

On November 5, 2025, the Court issued an Amended Temporary Restraining Order (ECF No. 186), ordering Plaintiff to identify and submit a log of all videos referencing Ms. Kertis or Ms. Liddell that were published between September 1 and November 13, 2025.

1 Plaintiff served a **preliminary log** on November 10, 2025, and is submitting a **consolidated and**
2 **updated video log** with this Motion as **Exhibit A**. However, due to the substantial scope of the
3 required review, Plaintiff is unable to certify the list as complete and respectfully seeks a
4 reasonable extension.
5

6 7 8 **II. GOOD CAUSE FOR EXTENSION (Fed. R. Civ. P. 6(b)(1))**

9
10 Plaintiff respectfully submits that the following circumstances constitute good cause to extend
11 the deadline:
12

13 **A. Volume of Content and Scope of Review**

14
15 Plaintiff, as an independent journalist and content creator, has posted approximately **6,000**
16 **videos** across multiple social media platforms between September 1 and November 13, 2025.
17 These include platforms with limited metadata visibility, such as Facebook, YouTube,
18 Instagram, and TikTok.
19

20 Compliance with the TRO requires:
21

- 22 • Manual review of thousands of short-form videos totaling over **30+ hours** of footage.
- 23 • Verification of metadata (e.g., dates, names, content context), much of which is not
- 24 searchable or readily accessible.
- 25 • Organization and categorization by platform, date, and relevance.
- 26
- 27
- 28

1 This review is being conducted **without technical staff or legal support**, and solely by Plaintiff,
2 a pro se litigant.

3 4 **B. Pro Se Status and Diligence**

5
6 Plaintiff has acted in good faith, diligently attempting to comply by:

- 7
8 • Serving a preliminary video log on November 10, 2025, identifying known responsive
9 videos.
- 10 • Continuing to review archives and metadata daily to refine the list.
- 11 • Filing this Motion and supplemental Exhibit A on November 13, 2025, to comply with
12 the TRO's stated deadline.

13
14 The **Supreme Court has instructed courts to liberally construe filings of pro se litigants**,
15 who must be afforded some flexibility in navigating complex procedural burdens. *See Haines v.*
16 *Kerner*, 404 U.S. 519 (1972).

17 18 **C. Substantial and One-Sided Burden**

19
20 This compliance burden falls entirely on Plaintiff, without reciprocal discovery. No evidentiary
21 showing has yet been made by Defendants that the videos in question contain unlawful or
22 sanctionable content. Plaintiff seeks this extension solely to complete the factual task of video
23 identification—not to contest the order.
24

25 26 27 **III. REQUESTED RELIEF**

28 PLEADING TITLE - 3

Plaintiff respectfully requests:

1. A **45-day extension**, or such other reasonable period as the Court deems appropriate, to complete final compliance with the TRO requirements in ECF No. 186;
2. That the attached **Exhibit A** be accepted as timely **interim compliance** with the TRO pending full submission;
3. That the Court take **judicial notice of Plaintiff's good faith efforts**, and that no adverse inference be drawn from missing metadata in the current submission;
4. That Plaintiff be permitted to **supplement** or **amend** the log as discovery proceeds and additional responsive videos are identified.

IV. CONCLUSION

This request is made in **good faith**, not for purposes of delay, and to ensure that Plaintiff can comply fully and accurately with the Court's Order. An extension will allow for thorough compliance without prejudicing any party and will advance the Court's interest in a fair and complete factual record.

DATED this 13th day of November, 2025.

Respectfully Submitted,

/s/ **Drew J. Ribar**

3480 Pershing Ln.

Washoe Valley, NV 89704

PLEADING TITLE - 4

(775) 223-7899

Const2Audit@gmail.com

1 **CERTIFICATE OF SERVICE**

2
3 I certify that on this 13th day of November, 2025, I submitted the foregoing:

- 4
- 5 • Plaintiff's Motion for Extension of Time to Complete Video Log Compliance
 - 6 • Notice of Updated Video Log Submission (Exhibit A)
- 7

8 to:

9 **U.S. District Court – District of Nevada**

10
11 Via email: Reno_Public_Docketing@nvd.uscourts.gov

12
13 And served copies via email on all counsel of record.

14 Respectfully submitted,

15 /s/ **Drew J. Ribar**

16
17 Pro Se

PLAINTIFF’S UPDATED VIDEO LOG (PER ECF NO. 186)

Compiled by: Drew J. Ribar

Date Submitted to Defense Counsel: November 13, 2025

Period Covered: September 1, 2025 – November 13, 2025

Platforms: YouTube, Facebook

EXHIBIT A

Plaintiff’s Consolidated Video Log (Per ECF No. 186)

Submitted by Plaintiff: Drew J. Ribar

Date of Submission: November 13, 2025

Covers Period: September 1, 2025 – November 13, 2025

Platforms: YouTube, Facebook (“Ribar for Nevada” and “Auditing Reno 911”)

A. YouTube Livestreams Documenting TRO Compliance Work

Date	Platform	Link
Nov 9, 2025	YouTube	https://youtube.com/live/1Its6Q3nCyo?feature=share
Nov 8, 2025	YouTube	https://youtube.com/live/3MVUnFrQJ4?feature=share
Nov 8, 2025	YouTube	https://youtube.com/live/ShQDvAaYwG8?feature=share
November 13, 2025		https://youtube.com/live/kG7uqsa32p4?feature=share

B. Facebook – “Ribar for Nevada” Page: Videos Referencing Ms. Kertis or Ms. Liddell

Dated Entries

Date	Platform	Link
Sep 15, 2025	Facebook	https://www.facebook.com/share/p/1ABXpddL43/
Sep 20, 2025	Facebook	https://www.facebook.com/share/v/14RDrLzX5GA/
Sep 20, 2025	Facebook	https://www.facebook.com/share/v/19vhUy1gJb/
Oct 14, 2025	Facebook	https://www.facebook.com/share/p/183opni9Ti/
Oct 25, 2025	Facebook	https://www.facebook.com/share/p/1C1qtJzfC2/
Oct 26, 2025	Facebook	https://www.facebook.com/share/p/1Hp1CMnxsK/
Nov 8, 2025	Facebook	https://www.facebook.com/share/v/1ESPi8gBQ1/

Undated Entries

Date	Platform	Link
[Unknown]	Facebook	https://www.facebook.com/share/r/1AGCAxKD5u/
[Unknown]	Facebook	https://www.facebook.com/share/r/1C1kjducdP/
[Unknown]	Facebook	https://www.facebook.com/share/v/1DRyQJDghG/
[Unknown]	Facebook	https://www.facebook.com/share/p/14MsgHXnCUm/

Date	Platform	Link
[Unknown]	Facebook	https://www.facebook.com/share/p/1JboNcRVsp/
[Unknown]	Facebook	https://www.facebook.com/share/v/1SegxSZNTF/
[Unknown]	Facebook	https://www.facebook.com/share/r/16wvPzyMQ2/
[Unknown]	Facebook	https://www.facebook.com/share/r/1B9VYq6MX4/
[Unknown]	Facebook	https://www.facebook.com/share/r/1FfTq5NACK/
[Unknown]	Facebook	https://www.facebook.com/share/r/1AMVQXyKBC/
[Unknown]	Facebook	https://www.facebook.com/share/r/1CcBWNCgj5/
[Unknown]	Facebook	https://www.facebook.com/share/r/17iXZmGpiR/
[Unknown]	Facebook	https://www.facebook.com/share/r/17cPeLboaw/
[Unknown]	Facebook	https://www.facebook.com/share/r/1ER7wy4S8H/
[Unknown]	Facebook	https://www.facebook.com/share/r/17Pej6w29k/
[Unknown]	Facebook	https://www.facebook.com/share/r/19u52iYa4C/

C. Facebook – “Auditing Reno 911” Page: Additional Videos Referencing

Litigation or Counsel

Dated Entries

Date	Platform	Link
Nov 11, 2025	Facebook	https://www.facebook.com/share/v/1BWp18wk7J/

Date	Platform	Link
Nov 11, 2025	Facebook	https://www.facebook.com/share/v/1YsYaEN3ML/
Nov 9, 2025	Facebook	https://www.facebook.com/share/v/1H6CzLu41P/
Nov 8, 2025	Facebook	https://www.facebook.com/share/v/1AsqEvAeQn/
Nov 8, 2025	Facebook	https://www.facebook.com/share/v/1Czom192Yd/
Nov 6, 2025	Facebook	https://www.facebook.com/share/v/1ADT51dtg2/
Nov 5, 2025	Facebook	https://www.facebook.com/share/1KSNVA1uxS/
Oct 30, 2025	Facebook	https://www.facebook.com/share/v/17fc2FqNTv/
Oct 28, 2025	Facebook	https://www.facebook.com/share/r/1FhZJFghP5/
Oct 28, 2025	Facebook	https://www.facebook.com/share/r/1D2vH3vNFx/
Oct 28, 2025	Facebook	https://www.facebook.com/share/r/17Kn5uSYin/
Oct 28, 2025	Facebook	https://www.facebook.com/share/r/1AG5x4dRoV/
Oct 28, 2025	Facebook	https://www.facebook.com/share/r/1DYQrzhVFi/
Oct 28, 2025	Facebook	https://www.facebook.com/share/r/1FtvukCqm7/
Oct 28, 2025	Facebook	https://www.facebook.com/share/r/1BSdoUWwN9/
Oct 27, 2025	Facebook	https://www.facebook.com/share/r/1CXDmFeu8t/
Oct 27, 2025	Facebook	https://www.facebook.com/share/r/1CfS3qigiE/
Oct 27, 2025	Facebook	https://www.facebook.com/share/r/1CtByWHsNg/
Oct 27, 2025	Facebook	https://www.facebook.com/share/r/1CwxYsHXVe/
Oct 27, 2025	Facebook	https://www.facebook.com/share/r/16HVvAhLgW/

Date	Platform	Link
Oct 27, 2025	Facebook	https://www.facebook.com/share/r/16iVtj2GpQ/
Oct 27, 2025	Facebook	https://www.facebook.com/share/r/17kA85BV28/
Oct 27, 2025	Facebook	https://www.facebook.com/share/r/1KmXvLGmsB/
Oct 27, 2025	Facebook	https://www.facebook.com/share/r/16akb6ASnh/
Oct 27, 2025	Facebook	https://www.facebook.com/share/r/17cKf6KjPv/
Oct 26, 2025	Facebook	https://www.facebook.com/share/r/1FyQqFj4P2/
Oct 26, 2025	Facebook	https://www.facebook.com/share/r/1BefuFypc8/
Oct 26, 2025	Facebook	https://www.facebook.com/share/v/1CyRUihj5M/
Oct 26, 2025	Facebook	https://www.facebook.com/share/r/1GUKPy67uC/
Oct 25, 2025	Facebook	https://www.facebook.com/share/r/1A5xXsW2gC/
Oct 25, 2025	Facebook	https://www.facebook.com/share/r/1DNYtqNu2b/
Oct 25, 2025	Facebook	https://www.facebook.com/share/v/18tmq9AUra/
Oct 25, 2025	Facebook	https://www.facebook.com/share/v/1BjavhDK3Q/
Oct 1, 2025	Facebook	https://www.facebook.com/share/v/1BkNnsJL75/
Sep 30, 2025	Facebook	https://www.facebook.com/share/v/17LWMR7EJh/

Undated Entries

Date	Platform	Link
[Unknown]	Facebook	https://www.facebook.com/share/v/1BxBJtFjnY/

Date	Platform	Link
[Unknown]	Facebook	https://www.facebook.com/share/r/14Thr4NGSv9/
[Unknown]	Facebook	https://www.facebook.com/share/r/1DEqCQCJBj/
[Unknown]	Facebook	https://www.facebook.com/share/v/1Co9ZQGVTh/
[Unknown]	Facebook	https://www.facebook.com/share/v/1FqKmJ9ELy/
[Unknown]	Facebook	https://www.facebook.com/share/p/1A1LZAxpzr/
[Unknown]	Facebook	https://www.facebook.com/share/v/1BsHeR5sqv/
[Unknown]	Facebook	https://www.facebook.com/share/v/1As4dMLcTs/
[Unknown]	Facebook	https://www.facebook.com/share/v/1ANq759Thd/
[Unknown]	Facebook	https://www.facebook.com/share/v/1AV5Tkm1sz/
[Unknown]	Facebook	https://www.facebook.com/share/p/17PKXozfjp/
[Unknown]	Facebook	https://www.facebook.com/share/17YMn31FZm/
[Unknown]	Facebook	https://www.facebook.com/share/v/1ACyvet3rw/
[Unknown]	Facebook	https://www.facebook.com/share/v/1DKPBuRHD7/
[Unknown]	Facebook	https://www.facebook.com/share/1Ch3eD4Y6o/
[Unknown]	Facebook	https://www.facebook.com/share/1Ntkq9kz56/
[Unknown]	Facebook	https://www.facebook.com/share/p/17NFRikb8p/
[Unknown]	Facebook	https://www.facebook.com/share/v/1CfaWcvuoo/
[Unknown]	Facebook	https://www.facebook.com/share/1EP9hCMBtG/
[Unknown]	Facebook	https://www.facebook.com/share/1DCygcgz9r/

Date	Platform	Link
[Unknown]	Facebook	https://www.facebook.com/share/p/1GGxhUCpij/
[Unknown]	Facebook	https://www.facebook.com/share/v/1BSTJPHiTo/
[Unknown]	Facebook	https://www.facebook.com/share/v/17kRwt6Tut/
[Unknown]	Facebook	https://www.facebook.com/share/p/1Ah89qf5Y6/
[Unknown]	Facebook	https://www.facebook.com/share/p/17JqTjGr66/
[Unknown]	Facebook	https://www.facebook.com/share/p/1Crb4Ft4eP/

Notes:

- Many videos reference the litigation and TRO compliance.
- Some directly name or depict Ms. Kertis or Ms. Liddell, as directed by **ECF No. 186**.
- Undated videos are still being reviewed. Plaintiff will supplement upon verification.
- Plaintiff continues to review Instagram, TikTok, YouTube, and Facebook archives for additional content.

Certification

I, **Drew J. Ribar**, certify under penalty of perjury that this log is accurate to the best of my knowledge as of **November 13, 2025**.

1 /s/ **Drew J. Ribar**

2 **Drew J. Ribar**

3 Email: Const2Audit@gmail.com

4 Phone: (775) 223-7899